

TREBICKA EX. I

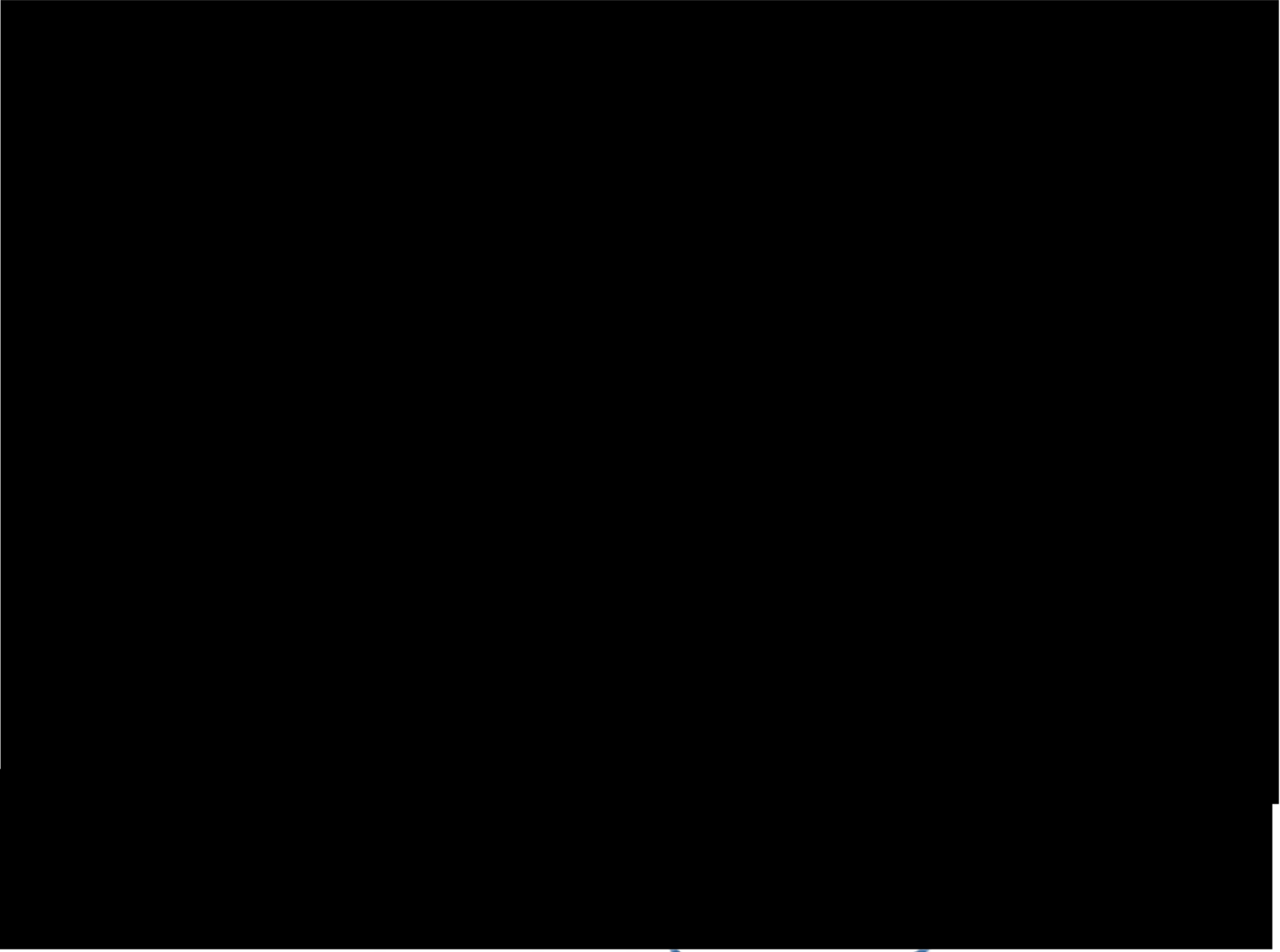
REDACTED VERSION
OF DOCUMENT SOUGHT
TO BE SEALED

Exhibit 7

Ryan McGee x3030

From: Mark C. Mao <mmao@BSFLLP.com>
Sent: Monday, May 24, 2021 4:04 PM
To: Josef Ansorge; GOOGLETEAM@lists.susmangodfrey.com
Cc: QE Brown
Subject: RE: Brown v. Google - 2021-05-12 Google's Ltr Responding to Plfs' April 30 & May 11 letters

And where GA and Ad Manager use the twice baked is from your own documents. See BRWN-26832, BRWN-27306, BRWN-27381, but in particular the red below from 27306:



If you still have trouble finding the right people for the information, please let me know. Thanks.

From: Mark C. Mao
Sent: Monday, May 24, 2021 12:48 PM
To: Josef Ansorge <josefansorge@quinnemanuel.com>; GOOGLETEAM@lists.susmangodfrey.com

Cc: QE Brown <gebrown@quinnemanuel.com>

Subject: RE: Brown v. Google - 2021-05-12 Google's Ltr Responding to Plfs' April 30 & May 11 letters

Josef –

Respectfully, you have not explained this before. In fact, your team said at the last hearing that my questions were outlandish because you had no idea what I was talking about. So pardon me if I am a little skeptical about the thoroughness of your explanation.

And what about the GA cookies in terms of twice-baked cookies or identifiers, which would include GA and GID cookies? And I do not know what other Google-related cookies are related to GA and Ad Manager. So please be thorough, that way we can properly meet and confer.

Please let me know. Thank you.

From: Josef Ansorge <josefansorge@quinnemanuel.com>

Sent: Monday, May 24, 2021 8:24 AM

To: Mark C. Mao <mmao@BSFLLP.com>; GOOGLETEAM@lists.susmangodfrey.com

Cc: QE Brown <gebrown@quinnemanuel.com>

Subject: RE: Brown v. Google - 2021-05-12 Google's Ltr Responding to Plfs' April 30 & May 11 letters

Mark,

We explained this before, but below it is broken down step by step and with more details. For Plaintiffs to capture cookie values from which we can derive unauthenticated identifiers [REDACTED], please have your clients take the following steps:

1. Enter private browsing mode on the alleged devices.
2. Visit the websites alleged in the complaint. (E.g. Mr. Brown visits [Apartments.com](https://www.apartments.com), see SAC ¶ 167.)
3. Open developer tools.
4. In Chrome go to “Application” and then “Cookies.”
5. Copy all cookie values for the ANID, NID, and IDE cookies.
6. Send us those values within 3 days.

We previously recommended simply copying all cookie values because we thought that instruction would be easier for your clients to follow.

Best,

Josef Ansorge

Of Counsel,

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Mark C. Mao [<mailto:mmao@BSFLLP.com>]

Sent: Friday, May 21, 2021 7:36 PM

To: GOOGLETEAM@lists.susmangodfrey.com

Cc: QE Brown <gebrown@quinnemanuel.com>

Subject: RE: Brown v. Google - 2021-05-12 Google's Ltr Responding to Plfs' April 30 & May 11 letters

[EXTERNAL EMAIL from mmao@bsfllp.com]

Counsel:

In response to your attached May 12 letter, we have spent considerable time trying to decipher your uninformative "instructions" for the twice baked cookies, and found the whole exercise a complete failure to meet and confer on your part. For example:

- 1) You do not tell me from which Google or Google-related domain on a website, I should be looking for the twice baked cookies;
- 2) You do not tell me whether I am also looking for Google's twice baked cookies in "first party" cookies, such as in a Google Analytics cookie, as opposed to a "third party" cookie, such as one issued by Ad Manager/DoubleClick;
- 3) You do not tell me in which Google-dropped cookies I can find the twice baked cookies;
- 4) You have provided no instructions on what part(s) of these Google cookies I can find the twice baked cookies; and
- 5) You do not tell me when a Google domain, or Google-supported "first party" domain, would be dropping a Google cookie or Google supported "first party" cookie containing the twice baked cookies. (For example, I noticed that sometimes Google domains seem to drop new cookies after a longer period of time has passed, or the browsing activity persists. I also can see new cookies sometimes when coming back from a [Google.com](https://www.google.com) tab, or when opening a new tab off of a [Google.com](https://www.google.com) tab.) But Google clearly has source code and algorithm for such automated processes.

I think you knew that I would be running circles when you sent the attached letter, and I respectfully ask now that you provide clear and explicit instructions on how exactly these twice baked cookies are generated.

The Court ordered that our Plaintiffs' unauthenticated data – individually and for their devices – be immediately produced by Google. I think you would tend to agree that your instructions are anything but a reasonable attempt to produce such data. You have [REDACTED] which includes not only the twice-baked cookie IDs, but IP addresses and device addresses. And you also have access to the raw refer header logs/data.

So please clarify immediately, as this makes it doubly clear as to why providing us the clean room access to [REDACTED], as we had already demanded, is a more reasonable and efficient way to get this data. Thank you.

From: Tracy Gao <tracygao@quinnemanuel.com>

Sent: Wednesday, May 12, 2021 5:09 PM

To: Mark C. Mao <mmao@BSFLLP.com>; GOOGLETEAM@lists.susmangodfrey.com; Beko Richardson <brichardson@BSFLLP.com>

Cc: QE Brown <gebrown@quinnemanuel.com>

Subject: Brown v. Google - 2021-05-12 Google's Ltr Responding to Plfs' April 30 & May 11 letters

Counsel,

Please see attached correspondence.

Thanks,
Tracy

Tracy Gao

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